

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 09/05/2024

FRANK J. GAVIRIA, Esq.
FRANK J. GAVIRIA, P.
14 N.E. 1st Avenue, Suite #300
Miami, Florida 33132
Telephone: (305) 379-4441
Fax: (786) 509-8088
E-mail: frank@fjgfirm.com

September 5, 2024

Delivered Via E-Mail

The Honorable Analisa Torres
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

In re: United States of America v. Juan Tacuri
Case No. 1:22-CR-00622-AT-2

United States District Court for the Southern District of New York

Dear Judge Torres:

I represent Defendant, Juan Tacuri, who entered his plea of guilty to the charge of Conspiracy to Commit Wire Fraud, in violation of Title 18 U.S.C. §1349, on June 5, 2024.

Presently, the Sentencing Hearing is scheduled for October 15, 2024 at 2:00 p.m. [D.E. 108]. The Court previously entered its order providing that the respective sentencing submissions be filed by Defendant by September 6, 2024, and the Government's submission be filed by September 13, 2024.

As a result of other federal court obligations in various districts, the defense is in need of a two (2) week extension of time beyond the September 6, 2024 date in which to prepare and file the Defendant's sentencing submission.

Additionally, I have been in contact with A.U.S.A. Benjamin A. Gianforti, and he has advised that the Government does not oppose this motion and joins in this request, and in-fact requests that the time for the Government to file their sentencing submission be extended by two (2) weeks beyond the September 13, 2024 date as well.

This joint letter motion is submitted in the utmost of good faith and in the interest of justice, and is not the result of a lack of due diligence.

Respectfully submitted,

FRANK J. GAVIRIA, P.A.
14 N.E. 1st Avenue, Suite #300
Miami, Florida 33132
Telephone: (305) 379-4441
Facsimile: (786) 509-8088
Email: thefloridalawyer@yahoo.com
(Counsel for Defendant, *Juan Tacuri*.)

/s/ Frank J. Gaviria
Frank J. Gaviria, Esq.
Fla. Bar No. 979058

cc: Benjamin A. Gianforti, A.U.S.A.
Michael Maimin, A.U.S.A.

GRANTED. Defendant shall file his sentencing submission by **September 20, 2024**, and the Government shall file its submission by **September 27, 2024**.

SO ORDERED.

Dated: September 5, 2024
New York, New York


ANALISA TORRES
United States District Judge